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**Joshua Zuckerberg**  
**Partner**

Direct Tel: 212-326-0885  
Direct Fax: 212-798-6379  
[jzuckerberg@pryorcashman.com](mailto:jzuckerberg@pryorcashman.com)

November 11, 2019

**VIA ECF**

The Hon. Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
718-613-2170

**Re: Liyou Xing v. Mayflower International Hotel Group Inc. et al.**  
**Case No. 18-cv-06616 (PKC)(LB)**

Dear Honorable Judge Bloom:

We are co-counsel with Wa (Lucia) Yang, Esq, of Kevin Kevering Tung, P.C. for the Defendants in this action. We write in opposition to the request by Plaintiff's counsel to extend discovery until February 27, 2020. Plaintiff's counsel made several misrepresentations in their request for additional time to complete discovery. In summary, Plaintiff's counsel has failed to acknowledge their failure to prosecute this case.

While Plaintiff claims that the "parties have completed the fact discovery," this is demonstrably false. Although both sides have responded to initial document requests, Plaintiff has been unwilling to sit for a deposition. In addition, Plaintiff's counsel failed to disclose their unresponsiveness to Defendants' repeated requests to schedule Plaintiff's deposition since September 19, 2019 (see the attached email correspondence between counsel to schedule depositions). While we tried to resolve the deposition schedule with Plaintiff's counsel without court intervention, Plaintiff's counsel routinely ignored our requests. As of now, we have no choice but to seek the court's approval allowing Defendants' counsel to **depone Plaintiff on December 10 or 11, 2019, prior to Defendants' depositions, which could take place on December 18, 2019.**

In the instant matter, Plaintiff Liyou Xing's deposition should be taken prior to Defendants' depositions, even if Plaintiff served his notice first. When it comes to establishing priority of depositions based on the order of notices, EDNY takes the view that "a discovery priority is not established based upon which party noticed a deposition first, but rather, Rule 26(d) authorizes the court to order the sequence of discovery upon motion." *Arneault v. Pentair*,

**■ PRYOR CASHMAN LLP**

The Hon. Lois Bloom

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November 11, 2019

*Inc.*, 2012 WL 5932956, \*10 (E.D.N.Y. Nov. 26, 2012). In *Diaz v. Major Auto. Grp.*, 2010 U.S. Dist. LEXIS 109882 (E.D.N.Y. Oct. 15, 2010), the Court held that the depositions of plaintiffs should be held before defendant was deposed, even though plaintiffs served deposition notices before defendant did, because “as a general rule, it would be preferable that the defendant be afforded first right to take the deposition of the plaintiff.” *Id.* at \*2.

The pending Motion for Conditional Certification should play no role in determining whether discovery should proceed in this case. This case was filed on November 20, 2018, almost a full year ago, and still Plaintiff has not sit for a deposition and explained the details of his allegations. Accordingly, we respectfully request this court to extend the time to complete discovery until January 31, 2020, not February 27, 2020, so that the parties proceed in earnest to conduct and conclude discovery.

We appreciate the Court’s consideration of this matter.

Respectfully,

  
Joshua Zuckerberg

Enclosures

cc: All counsel of record via ECF

RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

---

From: Zuckerberg, Joshua (jzuckerberg@pryorcashman.com)

To: troylaw@troypllc.com

Cc: lwyang@kktlawfirm.com; ktung@kktlawfirm.com

Date: Tuesday, November 5, 2019, 10:35 AM EST

---

Troy Firm -

Please let me know if we will be able to work out a deposition schedule, which I have been making repeated efforts to do, or if we need to seek the Court's intervention to do so. Seeking the Court's intervention seems like a terrible idea, but at this point, you folks seem utterly unwilling to engage in productive discussion on these issues. Please let me know how you want to proceed.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua

**Sent:** Thursday, October 31, 2019 10:41 AM

**To:** 'Troy Law' <troylaw@troypllc.com>

**Cc:** 'Lucia Yang' <lwyang@kktlawfirm.com>; 'Kevin Tung' <ktung@kktlawfirm.com>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Still no response?

Joshua Zuckerberg

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**From:** Zuckerberg, Joshua

**Sent:** Wednesday, October 30, 2019 12:57 PM

**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** 'Lucia Yang' <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; 'Kevin Tung' <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Troy Law—

I'm really unsure why this has been like getting blood from a stone. Can we set a deposition schedule? I have proposed one below that should satisfy your needs.

The most basic professional courtesy should dictate your responding to my repeated efforts to establish a deposition schedule.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua

**Sent:** Tuesday, October 29, 2019 11:47 AM

**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** 'Lucia Yang' <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; 'Kevin Tung' <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Troy Firm –

I have conceded to your request to have Defendant sit first. See below. But we need to confirm this schedule today. If we cannot work out a schedule, we will need to have the court do so, and she is likely to impose on us both a schedule that does not work well with our other commitments. So my strong advice is that we get this confirmed ASAP.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua

**Sent:** Monday, October 28, 2019 12:58 PM

**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** Lucia Yang <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

How about Ms. Hu sits for her deposition on Monday (11/11) and Plaintiff sits for his deposition on Wednesday 11/13? Please confirm today.

Joshua Zuckerberg

Partner

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**From:** Troy Law [mailto:troylaw@troypllc.com]

**Sent:** Monday, October 28, 2019 12:52 PM

**To:** Zuckerberg, Joshua <JZuckerberg@PRYORCASHMAN.com>

**Cc:** Lucia Yang <lwyang@kktlawfirm.com>; Kevin Tung <ktung@kktlawfirm.com>

**Subject:** Re: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Like I said time and again, the dates you proposed we are not good because of the deposition in other matters.

We will not consent to this unless you allow Plaintiffs to depose first since we have noticed you long back.

**TROY LAW**

**Attorneys & Counselors at Law**

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Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

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production of documents, which must be sent by e-mail*

*\*We do not keep originals or copies of clients, clients shall retain all their own*

On Fri, Oct 25, 2019 at 10:29 AM Zuckerberg, Joshua <JZuckerberg@pryorcashman.com> wrote:

Following up here. Please advise of your position. The stall, hinder, and delay approach to this litigation should end.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua  
**Sent:** Thursday, October 24, 2019 5:54 PM  
**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>  
**Cc:** Lucia Yang <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>  
**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Dear Troy Firm:

When it comes to establishing priority of depositions based on the order of notices, EDNY takes the view that “a discovery priority is **not** established based upon which party noticed a deposition first, but rather, Rule 26(d) authorizes the court to order the sequence of discovery upon motion.” Arneault v. Pentair, Inc., 2012 U.S. Dist. LEXIS 168185, \*28, 2012 WL 5932956. In Diaz v. Major Auto. Group, 2010 U.S. Dist. LEXIS 109882, \*2, the Court held that the depositions of plaintiffs should be held before defendant was deposed, even though plaintiffs served deposition notices before defendant did, because “as a general rule, it would be preferable that the defendant be afforded first right to take the deposition of the plaintiff.” Id. at 1-3.

Tomorrow, please advise as to your position concerning the deposition schedule which has been repeatedly proposed.

Joshua Zuckerberg

Partner

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**From:** Troy Law [<mailto:troylaw@troypllc.com>]

**Sent:** Monday, October 21, 2019 11:45 AM

**To:** Zuckerberg, Joshua <[JZuckerberg@PRYORCASHMAN.com](mailto:JZuckerberg@PRYORCASHMAN.com)>

**Cc:** Lucia Yang <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** Re: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Mr. Joshua,

I understand your concern, like we mentioned our scheduled is fully packed, and with only two practicing attorneys it is very difficult to cut a date that would be convenient for all of us. Also, when we mentioned for the parties to be deposed after the opt-in period, we meant about the pending Motion for conditional collective certification that is currently pending before the Judge to rule.

However, we are now available for the week of November 11, 2019 since the trial got cancelled.

So here's my proposal, Plaintiffs depose Defendants on November 11, 2019

and Defendants depose Plaintiffs on November 12, 2019.

Thanks,  
Regards

John Troy

/pk

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**Attorneys & Counselors at Law**

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production of documents, which must be sent by e-mail*

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On Fri, Oct 18, 2019 at 10:33 AM Zuckerberg, Joshua <[JZuckerberg@pryorcashman.com](mailto:JZuckerberg@pryorcashman.com)> wrote:

Dear Troy Law Counselors:

I am confused by the below email. First, as I stated yesterday, I do not see any record of an opt-in period being set by this Court. Second, discovery ends on 11/21, and still Plaintiff has not sat for a deposition. Third, we have already granted the courtesy of extending discovery once, despite the fact that you objected to a one week extension of time for us to respond to certain discovery responses (please review your July 21, 2019 letter, document 44 in the docket). I had previously offered to depose the Plaintiff any day the week of 10/28 or 11/4. You are now proposing that we do the deposition after December 9, 2019 or once the opt-in period is over (without noting that there doesn't seem to be a court-ordered opt-in period). So, the short answer is we need to depose the Plaintiff sometime the week of November 4 or November 11, on a day that works for our respective schedules. If you want to forego deposing our witnesses because you are too busy with other commitments, that's your decision. At this point, we're disinclined to agree to another extension of discovery when it doesn't seem like the Plaintiff is interested in satisfying his obligations under the FRCP. Please let me know how you would like to proceed and feel free to call and discuss the situation.

Sincerely,

Joshua Zuckerberg

Partner

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**From:** Troy Law [mailto:[troylaw@troypllc.com](mailto:troylaw@troypllc.com)]

**Sent:** Wednesday, October 16, 2019 2:37 PM

**To:** Zuckerberg, Joshua <[JZuckerberg@PRYORCASHMAN.com](mailto:JZuckerberg@PRYORCASHMAN.com)>

**Cc:** Lucia Yang <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** Re: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Dear Counselor,

Unfortunately, we have a week long trial scheduled to start from October 28, 2019 in an out of state court matter and on November 04, 2019, I have an Oral Argument and Out of state Court appearance scheduled for that day which cannot be adjourned.

Additionally, our office does not have any dates in the month of October or until after December 09, 2019.

The reason being before, December 09, 2019, i.e., excluding the prescheduled court conference and other pre scheduled events, we have four trials scheduled and all of them are about a week long.

For the convenience of all the parties involved and to save your clients resources and ours, we recommend to hold the deposition once the opt in period is over.

Please let us know how you would like to proceed.

Thanks,

Regards

Aaron

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**Attorneys & Counselors at Law**

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production of documents, which must be sent by e-mail*

*\*We do not keep originals or copies of clients, clients shall retain all their own*

On Wed, Oct 16, 2019 at 1:28 PM Zuckerberg, Joshua <[JZuckerberg@pryorcashman.com](mailto:JZuckerberg@pryorcashman.com)> wrote:

Have you heard from your client? I'm reluctant to have my clients block out a day when we don't even know that the plaintiff has any intention of showing up for a deposition. Please advise.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua

**Sent:** Tuesday, October 15, 2019 10:46 AM

**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** 'Lucia Yang' <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; 'Kevin Tung' <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Following up on this.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua

**Sent:** Monday, October 14, 2019 5:20 PM

**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** Lucia Yang <[lyyang@kktlawfirm.com](mailto:lyyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Let us know when you have confirmed available dates for the Plaintiff.

Joshua Zuckerberg

Partner

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**From:** Troy Law [<mailto:troylaw@troypllc.com>]

**Sent:** Monday, October 14, 2019 3:09 PM

**To:** Zuckerberg, Joshua <[JZuckerberg@PRYORCASHMAN.com](mailto:JZuckerberg@PRYORCASHMAN.com)>

**Cc:** Lucia Yang <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** Re: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

We would seek to depose Weihong Hu, Xiaozhuang Ge, and 30(b)(6) witnesses for the six corporate defendants.

Please let us know:

- 1) who will be the 30(b)(6) witness for each corporation;
- 2) which if any of these individuals will be available on October 25, 2019 or November 11, 2019; and
- 3) which if any of these individuals will require an interpreter, and if so in what language.

Aaron

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**Attorneys & Counselors at Law**

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*\*We do not keep originals or copies of clients, clients shall retain all their own*

On Mon, Oct 14, 2019 at 10:58 AM Zuckerberg, Joshua <[JZuckerberg@pryorcashman.com](mailto:JZuckerberg@pryorcashman.com)> wrote:

Mr. Troy and Aaron - Who specifically do you want to depose on 11/11? I have a call into them to discuss availability, but I realize that I'm not certain who, specifically, you want to depose.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua

**Sent:** Friday, October 11, 2019 2:14 PM

**To:** Troy Law <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** Lucia Yang <[lyyang@kktlawfirm.com](mailto:lyyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** Re: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

10/25 is not good for me but I will confer with them re 11/11, assuming your client has been deposed before then

Sent from my iPhone, so please excuse brevity and typographical errors.

On Oct 11, 2019, at 2:12 PM, Troy Law <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)> wrote:

Dear Joshua:

While we confirm with our clients, Please confer with your clients and let us know if they are available to be deposed on either October 25, 2019, or November 11, 2019.

Thanks,  
Regards

Aaron

/pk

**TROY LAW**  
**Attorneys & Counselors at Law**  
Queens: 41-25 Kissena Blvd., Suite 119, Flushing, NY 11355 Tel: (718) 762-1324  
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*\*We do not keep originals or copies of clients, clients shall retain all their own*

On Thu, Oct 10, 2019 at 4:47 PM Zuckerberg, Joshua  
<[JZuckerberg@pryorcashman.com](mailto:JZuckerberg@pryorcashman.com)> wrote:

Aaron has just confirmed for me that he will check with your client (the Plaintiff, Mr. Xing) as to his availability for deposition sometime during the week of 10/28 and 11/4. We anticipate that this will be a full day deposition. Please advise if a translator will be needed. If the case is certified as a collective action, we will of course want to depose the other identified potential plaintiffs. Discovery closes on 11/21.

Joshua Zuckerberg

Partner

Pryor Cashman LLP

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**From:** Zuckerberg, Joshua  
**Sent:** Thursday, October 10, 2019 4:41 PM  
**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>  
**Cc:** 'Lucia Yang' <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; 'Kevin Tung' <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>  
**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Mr. Troy – Are you withdrawing from the case? Please advise. We have not heard from you.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua  
**Sent:** Tuesday, October 08, 2019 4:07 PM  
**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>  
**Cc:** 'Lucia Yang' <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; 'Kevin Tung' <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>  
**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Mr. Troy – Following up here. We need to proceed to depose the Plaintiff. Discovery ends on 11/21, and we won't be inclined to consent to an

extension unless we have made significant strides toward its completion. Please let us know if your client intends to drop his prosecution of this claim or is ready to participate in discovery. Thank you.

Joshua Zuckerberg

Partner

Pryor Cashman LLP

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**From:** Zuckerberg, Joshua

**Sent:** Monday, October 07, 2019 11:29 AM

**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** 'Lucia Yang' <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; 'Kevin Tung' <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Counsel - Let's make sure to agree to a date for Plaintiff's deposition in the next day or two – we'd like the deposition to take place before the end of October.

Joshua Zuckerberg

Partner

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**From:** Zuckerberg, Joshua

**Sent:** Thursday, September 19, 2019 2:41 PM

**To:** 'Troy Law' <[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>

**Cc:** Lucia Yang <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>

**Subject:** RE: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Mr. Troy – We would like to schedule Plaintiff's deposition for sometime in the next 30-45 days. Please advise of available dates for you and your client.

Joshua Zuckerberg

Partner

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**From:** Troy Law [<mailto:troylaw@troypllc.com>]  
**Sent:** Wednesday, August 14, 2019 5:50 PM  
**To:** Zuckerberg, Joshua <[JZuckerberg@PRYORCASHMAN.com](mailto:JZuckerberg@PRYORCASHMAN.com)>  
**Cc:** Lucia Yang <[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>; Kevin Tung <[ktung@kktlawfirm.com](mailto:ktung@kktlawfirm.com)>  
**Subject:** Re: Liyou Xing v. Mayflower International Hotel Group Inc et al // Requesting Consent to Extend Discovery Deadline + Adjourn the Deposition

Counselors,

Thank you so much for your prompt response.

We shall go ahead and write to the Court regarding the same.

Thanks,  
Regards

John Troy

/pk

**TROY LAW**  
**Attorneys & Counselors at Law**  
Queens: 41-25 Kissena Blvd., Suite 119, Flushing, NY 11355 Tel: (718) 762-1324  
Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

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On Wed, Aug 14, 2019 at 4:57 PM Zuckerberg, Joshua <[JZuckerberg@pryorcashman.com](mailto:JZuckerberg@pryorcashman.com)> wrote:

We should endeavor to make 11/21 the end of discovery without further extensions, as I suspect the Court will expect as much. We trust that Mr. Troy's

office will make the request to the Court?

Sent from my iPhone, so please excuse brevity and typographical errors.

On Aug 14, 2019, at 2:26 PM, Lucia Yang  
<[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)<mailto:[lwyang@kktlawfirm.com](mailto:lwyang@kktlawfirm.com)>> wrote:

Dear Counsel,

We consent to the extension of fact discovery until November 21, 2019 and believe we may need more time for discovery as well.

Out of courtesy, we also consent to the adjournment of deposition of Mr. Xing. Please send us three dates that work for you so that we can reschedule Mr. Xing's deposition.

Regards,

Wa (Lucia) Yang, Esq.,  
KEVIN KERVENG TUNG, P.C.  
Attorneys At Law  
Queens Crossing Business Center  
136-20 38th Avenue, Suite 3D  
Flushing, NY 11354  
Tel: (718) 939-4633

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On Wednesday, August 14, 2019, 02:53:25 PM EDT, Troy Law  
<[troylaw@troypllc.com](mailto:troylaw@troypllc.com)<mailto:[troylaw@troypllc.com](mailto:troylaw@troypllc.com)>> wrote:

Dear Counselor,

We would like to request to extend discovery deadline from August 28, 2019 to November 21, 2019.

Also, Ms. Yang, we request to adjourn the deposition noticed to our client for

August 21, 2019. Counsel for Plaintiffs have a scheduling conflict and would not be able to appear on that day.

Kindly let us know your consent.

Thanks,

Regards

John Troy

/pk

**TROY LAW**

Attorneys & Counselors at Law

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Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

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